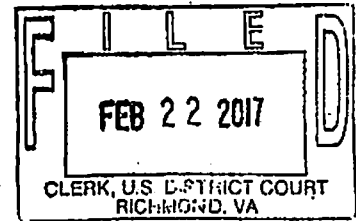


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA

v.

[REDACTED]
a/k/a [REDACTED]

and

WILLIAN REYNIERY MEDINA-ESCOBAR,
a/k/a "Pollo,"
a/k/a "Mazda,"

Defendants.

) UNDER SEAL

) No. 3:16CR091

) Count One: 21 U.S.C. §§ 963 and 959(b)
) (Conspiracy to Possess with Intent to
) Distribute and Distribute Five Kilograms or
) More of Cocaine on a United States
) Registered Aircraft)

) Forfeiture Allegation

February 2017 Term – at Richmond, Virginia

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

Unless otherwise specified, at all times relevant to this Indictment:

1. The Los Cachiros drug trafficking organization ("Los Cachiros DTO") was a large scale cocaine trafficking organization based in Honduras. The Los Cachiros DTO used air, land, and maritime routes to transport cocaine from Venezuela throughout Central America. To transport cocaine using air routes, the Los Cachiros DTO frequently used aircraft registered in the United States. Among other things, the Los Cachiros DTO received cocaine on behalf of other drug trafficking organizations, distributed cocaine to other drug trafficking organizations, and sold cocaine to other drug trafficking organizations.

2. [REDACTED] the defendant, was a citizen of Honduras. [REDACTED] served as a logistical coordinator for the Los Cachiros DTO and was responsible for preparing aircraft, selecting personnel for drug trafficking flights, and assisting in the coordination of flights to transport cocaine from Venezuela to Central America.

3. WILLIAN REYNIERY MEDINA-ESCOBAR, a/k/a "Pollo," a/k/a "Mazda," the defendant, was a citizen of Honduras. ESCOBAR served as a logistical coordinator for the Los Cachiros DTO and was responsible for preparing aircraft and selecting personnel for flights to transport cocaine from Venezuela to Central America. ESCOBAR also served as an intermediary for purchasing cocaine from Colombia-based suppliers, managed the transportation of cocaine via aircraft, and assisted in the receipt and offload of cocaine in Honduras.

COUNT ONE

(Conspiracy to Possess with Intent to Distribute and
Distribute Five Kilograms or More of Cocaine on United States Registered Aircraft)

4. The allegations in paragraphs 1 through 3 of this Indictment are incorporated by reference as though fully set forth here.

5. From at least in or about 2011, and continuing until in or about March 2014, in the Eastern District of Virginia and elsewhere, and in an offense begun and committed outside the territorial jurisdiction of the United States, including Guatemala, Venezuela, Honduras, and elsewhere, the defendants, [REDACTED] and WILLIAN REYNIERY MEDINA-ESCOBAR ("ESCOBAR"), a/k/a "Pollo," a/k/a "Mazda," whose point of entry into the United States will be in the Eastern District of Virginia, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to possess with the intent to distribute and distribute a controlled

substance, to wit, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, on board an aircraft registered in the United States, in violation of Title 21, United States Code, Sections 959(b), 960(b)(1)(B), and 963.

OBJECT OF THE CONSPIRACY

6. It was the object of the conspiracy to use aircraft registered in the United States to transport cocaine from Venezuela to Central America for distribution to other drug trafficking organizations in Central America.

MANNER AND MEANS OF THE CONSPIRACY

7. In order to further the conspiracy and to effect its illegal object, the conspiracy was carried out by way of the following manner and means, among others:
- a. From in or about 2011 through in or about 2013, the defendants inspected aircraft registered in the United States and negotiated the purchase of aircraft registered in the United States from known co-conspirators, on behalf of the Los Cachiros DTO and others.
 - b. From in or about 2011 through in or about 2013, the defendants facilitated the arrival and storage of aircraft registered in the United States on behalf of the Los Cachiros DTO and others in Guatemala City, Guatemala, by bribing airport security personnel.
 - c. From in or about 2011 through in or about 2013, the defendants managed the maintenance and alteration of aircraft registered in the United States to facilitate long distance flights to transport cocaine from Venezuela to Honduras on behalf of the Los Cachiros DTO and others.
 - d. From in or about 2011 through in or about 2013, the defendants assisted in selecting pilots and flight crew personnel to operate aircraft registered in the United States for

drug trafficking flights on behalf of the Los Cachiros DTO and others.

e. From in or about 2011 through in or about 2013, the defendants assisted in the planning, logistics, and management of using aircraft registered in the United States for drug trafficking flights on behalf of the Los Cachiros DTO and others.

f. In or about 2013, a known co-conspirator ("CC-1") agreed to purchase an aircraft registered in the United States, specifically a Beechcraft King Air C90 ("King Air C90") with tail number N92XXX, from a seller located in the Eastern District of Virginia. CC-1 subsequently sold the King Air C90 to the Los Cachiros DTO.

g. In or about July 2013, the King Air C90 flew to La Aurora International Airport in Guatemala City, Guatemala. [REDACTED], the defendant, facilitated the arrival and storage of the King Air C90 by bribing airport security officials on behalf of the Los Cachiros DTO.

h. Between in or about July 2013 and in or about October 2013, [REDACTED], the defendant, managed the maintenance and alteration of the King Air C90 to facilitate a long distance flight transporting cocaine from Venezuela to Honduras on behalf of the Los Cachiros DTO.

i. Between in or about July 2013, and in or about October 2013, ESCOBAR, the defendant, negotiated the purchase of approximately 1,000 kilograms of cocaine that were to be transported from Venezuela to Honduras on behalf of the Los Cachiros DTO.

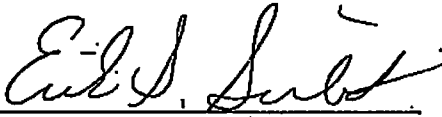
j. In or about October 2013, the King Air C90 flew from Guatemala to Venezuela for the purpose of loading and transporting approximately 1,000 kilograms of cocaine. Before the flight and while it was in the air, the defendants assisted in the planning,

A TRUE BILL

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



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